

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

ANDREA MARTINEZ,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 5:19-CV-6135-FJG

**Consent Motion for Extension of Time to  
Respond to Defendant United States' Motions to Exclude Expert Witnesses**

Comes now Plaintiff, by and through counsel, and respectfully requests an extension of time of ten (10) days, up to and including March 27, 2023, to respond to Defendant United States' Motion to Exclude Victoria Ford as an Expert Witness, Motion to Exclude Archie Heddings, MD as an Expert Witness, and Motion to Exclude Stephanie Haupt, MD as an Expert Witness. In support, Plaintiff states:

1. On March 3, 2023, Defendant United States filed three Motions to Exclude an Expert Witness (ECF Nos. 139, 140, 141).
2. Plaintiff's Suggestions in Opposition to the three motions are due on March 17, 2023.
3. Plaintiff makes this request because of the press of other obligations, including discovery response deadlines in other cases, a deposition for which counsel has to travel to a prison in mid-Missouri, as well as prearranged personal travel plans.
4. Counsel for the United States has been contacted and consents to this request.

Plaintiff hereby requests an extension of time of ten (10) days, up to and including March 27, 2023, to respond to Defendant United States' Motion to Exclude Victoria Ford as an Expert Witness, Motion to Exclude Archie Heddings, MD as an Expert Witness, and Motion to Exclude Stephanie Haupt, MD as an Expert Witness.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2023, a copy of the foregoing was filed electronically and served on all counsel of record by operation of the CM/ECF system.

/s/ Gillian R. Wilcox